

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JUDITH RAANAN, NATALIE RAANAN, URI RAANAN, ESTATE OF ITAY GLISKO, OREN GLISKO, LIAT RASEL GLISKO, Y.G., ORI GLISKO, and JEFFREY LUDMIR,

1:24-cv-00697 (JGK)

Plaintiffs,

-v-

BINANCE HOLDINGS LIMITED, CHANGPENG ZHAO, THE ISLAMIC REPUBLIC OF IRAN, and THE SYRIAN ARAB REPUBLIC,

Defendants.

ORDER REGARDING SERVICE AND PRELIMINARY SCHEDULING MATTERS

This Stipulation is entered into between defendants Binance Holdings Limited and Changpeng Zhao (together, the “Stipulating Defendants”) and plaintiffs Judith Raanan, *et al.* (“Plaintiffs”), through their undersigned counsel.

WHEREAS, Plaintiffs filed this action on January 31, 2024;

WHEREAS, having met and conferred, Plaintiffs and the Stipulating Defendants, subject to approval of the Court, wish to streamline preliminary matters in this action, minimize disputes, and avoid wasting resources and burdening the Court to the extent possible by: (i) avoiding the burden of serving foreign defendants through the Hague Convention; (ii) agreeing on a reasonable briefing schedule for the Stipulating Defendants’ anticipated Motion(s) to Dismiss; and (iii) agreeing to stay discovery pending resolution of such motion(s);

WHEREAS, neither Plaintiffs nor the Stipulating Defendants previously have requested or received time for an extension to answer or otherwise respond to the complaint in this action;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and the Stipulating Defendants, through their undersigned counsel, as follows:

1. The Stipulating Defendants hereby waive objections to the absence of a Summons or of service of the Summons and Complaint in this action and any defense based upon the sufficiency of service of process; provided, however, that the Stipulating Defendants do not waive, but rather expressly reserve, any and all other rights, defenses, and objections to the claims in this action (including but not limited to defenses based upon lack of personal or subject matter jurisdiction, lack of standing, improper venue, or a defendant having been improperly named). For the avoidance of doubt, by waiving service of the Summons and Complaint, the Stipulating Defendants do not concede that service has been effectuated within the Southern District of New York (or anywhere else), and Plaintiffs agree not to argue that the waiver affects any of the Stipulating Defendants' other rights, defenses, or objections (including but not limited to defenses based upon lack of personal or subject matter jurisdiction, lack of standing, improper venue, or a defendant having been improperly named);

2. No later than March 29, 2024, in accordance with Rules I.F and II.B of this Court's Individual Rules of Practice, the parties shall jointly request a pre-motion conference regarding the Stipulating Defendants' anticipated Motion(s) to Dismiss the Complaint (Docket No. 1).

3. Provided the Court authorizes the filing of the Stipulating Defendants' Motion(s) to Dismiss, and subject to the Court's approval, the parties (in order to accommodate Plaintiffs' counsel's trial schedule in another matter) will brief the Motion(s) to Dismiss as follows:

- a) The Stipulating Defendants will file their Motion(s) to Dismiss on or before May 3, 2024;
- b) Plaintiffs will file their opposition(s) to any such motion(s) on or before June 24, 2024; and
- c) The Stipulating Defendants will file their reply or replies on or before August 5, 2024.

4. Discovery relating to Plaintiffs' claims against the Stipulating Defendants shall be stayed pending resolution of the Stipulating Defendants' motion(s) to dismiss the operative complaint in this action.

5. To the extent that any Stipulating Defendant moves to dismiss for lack of personal jurisdiction, Plaintiffs reserve the right to request that the Court order jurisdictional discovery to support their opposition brief, and the Stipulating Defendants reserve their rights to oppose any such request.

Date: March 1, 2024

/s/ Amiad Kushner
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Attorneys for the Stipulating Defendants

SO ORDERED.

DATED: March 4, 2024

/s/ John G. Koeltl

New York, New York

The Honorable Judge John G. Koeltl
United States District Judge